

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**DEFENDANT’S OPPOSITION TO
GOVERNMENT’S MOTION FOR LEAVE TO FILE A SURREPLY**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully opposes the government’s motion for leave to file a surreply in which it seeks to revise and evade responsibility for its still-unsubstantiated charges against the defense.

If the government has evidence that any member of the defense has acted improperly so as to create “a problem of [our] own making,” DE 547 at 3, it should provide that evidence to defense counsel and to the Court without further delay. One more round of accusations and blame-shifting by counsel for the government (to which defense counsel cannot respond) will neither assist the Court, establish the facts, nor repair the damage already done. The motion for leave to file a surreply should therefore be denied, and the proposed surreply should be stricken.

Dated: September 15, 2014

Respectfully submitted,
DZHOKHAR TSARNAEV

by his attorneys

/s/ David I. Bruck

Judy Clarke, Esq. (CA Bar # 76071)
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800

San Diego, CA 92101
(619) 308-8484
JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq.
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 460-8188
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

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/s/ David I. Bruck